

CKR LAW LLP

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Edward L. Schnitzer, Esq.

Counsel to BST International Fashion Ltd

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
In re: : Chapter 11
: :
SEARS HOLDINGS CORPORATION, *et al.* : Case No. 18-23538-rdd
: (Jointly Administered)
Debtors. :
: :
-----x

NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that pursuant to 11 U.S.C. § 1109(b) and Fed. R. Bankr. P. 9010(b), CKR Law LLP, as counsel to BST International Fashion Ltd, a creditor and party in interest, in the jointly administered bankruptcy cases of Sears Holding Corporation, *et al.* (the “Debtors”), hereby enters its appearance and demands service of all notices and papers herein upon:

BST International Fashion Ltd
c/o Edward L. Schnitzer, Esq.
CKR Law LLP
1330 Avenue of the Americas, 14th Floor
New York, NY 10019
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and

A.R. Srinivasan
Managing Director
BST International Fashion Ltd
Suite 2301B, Skyline Tower
39 Wang Kwong Road
Kowloon Bay, Kowloon
Hong Kong

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all pleadings of any kind, including, without limitation, any notice, application, complaint, demand, request, motion, order, and all exhibits to the foregoing, whether written or oral, formal or informal, however transmitted.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Demand for Service of Papers (the “Notice”) nor any later appearance or pleading shall constitute be deemed a submission to the jurisdiction of this Court or construed to be a waiver of:

- a) rights to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Judge;
- b) rights to trial by jury in any proceedings as to any and all matters so triable, whether or not the same be designated legal or private rights, or in any case, controversy or pursuant to 28 U.S.C. § 157(b)(2), and whether such jury trial right is pursuant to statute or the United States Constitution;
- c) rights to seek abstention or remand of any matter or proceeding subject to mandatory or discretionary abstention or remand, and to have the District Court withdraw the reference in any matter or proceeding subject to mandatory or discretionary withdrawal;
- d) rights to receipt of service of process in all actions, causes, claims, or proceedings arising in, arising under or related to these proceedings, including the right to contest service of process;
- e) any other rights, claims, actions, defenses, setoffs, or recoupments, to which BST International Fashion Ltd is or may be entitled, in law or equity, all of

which rights, claims, actions, defenses, setoffs and recoupments, BST International Fashion Ltd expressly reserves.

Dated: January 21, 2019
New York, New York

CKR LAW LLP

/s/ Edward L. Schnitzer
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Counsel to BST International Fashion Ltd

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument has been served on this 21st day of January, 2019 upon all parties requesting service via ECF notification.

/s/ Edward L. Schnitzer

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